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SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20080002
Agency Interest No. 1157

Mr. Edward Scram
President
Stupp Corp
12555 Ronaldson Rd
Baton Rouge, LA 70708

RE: Part 70 Operating Permit, Stupp Corp-Baton Rouge Facility
Baton Rouge, East Baton Rouge Parish, Louisiana

Dear Mr. Scram:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the ____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 0840-00147-V0

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:cet
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

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I. Background

Stupp Corporation (hereinafter "Stupp"), an existing steel line pipe manufacturer located in Baton Rouge, Louisiana, originally operated under the name of Cal-Metal Pipe Corporation of Louisiana until the merger in 1991 with the St. Louis-based Stupp Bros. Inc. Stupp was issued their first air operating permit, State Permit No. 0840-00147-00 on December 22, 1994. The facility currently operates under State Permit No. 0840-00147-06, issued April 21, 2008.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Stupp on June 9, 2008 requesting a Part 70 operating permit.

III. Description

Stupp pipe products are utilized to transmit hydrocarbons for the energy needs of both industry and communities. Custom steel line pipe is produced using Electric Resistance Welded (ERW) Technology. State Permit No. 0840-00147-00 issued December 22, 1994 permitted the previously grandfathered facility which began operations in 1969.

On September 13, 1995, Stupp was issued State Permit No. 0840-00147-01 to increase annual paint and thinner usage to 1710 and 3420 gallons, respectively.

Changes allowed by State Permit No. 0840-00147-02 issued January 31, 1997 included

- Installation of a shear-end welder and spiral accumulator to allow continuous coil feed to the mill, and
- Installation of a laser stenciler to replace spray painting for identification of finished pipe.

State Permit No. 0840-00147-03 issued March 11, 2004, addressed changes in coolant and updated calculation methodologies.

On May 10, 2004, State Permit No. 0840-00147-04 was approved and allowed Stupp to do the following:

- Eliminate the water-base pipe coating process (96-8) and replace it with a metal shot blasting and filter operation (04-1);

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- Replace existing natural gas-fired furnace with a similar size natural gas-fired furnace. The new furnace was classified as an insignificant activity just as the previous furnace;
- Delineate the following point sources to insignificant activity status: Diesel Storage Tank (96-1), Emergency Diesel Generator (96-3), Pipe Cooling Vent (96-6) and Water Evaporator (02-1);
- Update emission rates for the Gasoline Storage Tank (96-2), Painting and Hand Stenciling Operation (96-4), Welding Operations (96-5) and Thinner Cleanup Operations (02-3) to reflect changes in emission factors and increases in operating hours;
- Delete the Smoke Collection System (02-2); and
- Add the existing cooling tower to the permit as an insignificant activity.

State Permit No. 0840-00147-05 approved February 15, 2007, included:

- An increase in permitted throughput and emissions for source ARE1 (96-4), Painting and Hand Stenciling Operations;
- Deletion of source ARE4 (04-1); Wheelabrator Shot Chamber and Filter;
- Reconciliation of emission calculations for four sources, ARE3 (02-3) Thinner Cleanup Operation, EQT4 (96-5) Welding Operation, EQT14 (04-2) Pipe Furnace, and EQT15 (96-2) Gasoline Storage Tank; and
- Deletion of two insignificant activities, the Water Evaporator and the Water Evaporator Heater.

An administrative Amendment to State Permit No. 0840-00147-05, dated May 29, 2007, removed Specific Requirement Numbers 13 and 14 concerning LAC33.III.2103 from the gasoline tank because the gasoline tank is a 1000 gallon tank equipped with a submerged fill pipe and is not subject to the vapor pressure determination requirements.

State Permit No. 0840-00147-06, dated April 21, 2008 consisted of:

- An increase in permitted throughput and emissions for source ARE1 (96-4), Painting and Hand Stenciling Operations;
- Deletion of source EQT14 (04-2); Pipe Furnace;
- Reconciliation of emission calculations for source, ARE3 (02-3) Thinner Cleanup Operation; and
- The addition of a new Spiral Mill Welding Operation, (08-1).

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This air permit addresses Stupp's change in status from a minor source of hazardous air pollutants/toxic air pollutants (HAP/TAP) to a major source. Pursuant to the provisions of Louisiana Administrative Code Title 33, Part III, Chapter 5, Section 525 (LAC 33:III.525), and in accordance with Specific Condition 15 of State Permit No. 0840-00147-06, approved April 21, 2008, the Stupp Mill in Baton Rouge prepared this request for an Initial Title V Operating Permit. Stupp is adjacent to the Bayou Coating facility. The Bayou Coating facility recently increased coating operations and was therefore reclassified as a major source of HAP/TAP and was issued Part 70 Operating Permit No. 27559 on July 27, 2007. Since both facilities are co-located and under common control of Stupp Brothers, the Stupp Mill facility is also required to obtain a Title V permit.

Existing and proposed processes at the Stupp Baton Rouge Facility include:

LINE MILL

The manufacturing process involves making line pipe out of coiled rolls of low alloy steel. The steel coils are unrolled and flattened at the pipe-manufacturing mill. The flat sheet of steel is fed through a "slitter" that cuts the steel into the appropriate width for the specified diameter of pipe to be produced. The flattened steel is then fed through hardened rollers that bend the steel into a tube shaped cylinder. The tube is fed through an electric resistance welder (ERW) that fuses the edges together to produce a joint of pipe.

Once welding is complete, the newly formed pipe is heated to normalize the weld seam and refine the grain structure of the steel to its original pre-welding form. After heat-treating the pipe, it is quenched to room temperature to allow for proper sizing and strengthening. Each length of pipe is automatically cut to a specified length using a rotary cut-off-machine. The pipe is pressure tested with water and the ends are beveled. Finished pipe is marked using spray paint and stencils and loaded onto rail cars by a Gantry crane or onto trucks using forklifts.

NEW SPIRAL MILL

This production process is designed as a two-stage welding operation. A continuous tack weld is applied on the spiral weld machine. The final weld is applied on one of three submerged arc welding lines. The spiral weld line will be equipped to process coils up to 50 tons and 80 inches wide. Coils will be welded together to provide a continuous process through the spiral weld machine. Edge milling will provide profiles to support downstream welding operations. Weld quality on both spiral and finished welding lines is continuously monitored electronically for consistency.

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PIPE LABELING PROCESS

Labels with both conventional, as well as two-dimensional bar codes are attached to the ID surface of each pipe for tracking. The conventional bar code consists of the traceable Pipe ID number. The two-dimensional bar code is encoded with all of the pipe data that is printed on the label. The label is in addition to required paint markings.

In addition to obtaining a Part 70 Operating Permit as required by Specific Condition 15 of Permit No. 0840-000147-06, for the existing Line Pipe Mill and the new Spiral Mill scheduled for completion in 2009, Stupp Corporation proposes the following modifications in this permitting activity:

- Increase gasoline throughput to 7,500 gallons per year (VOC increase of 0.2 tpy);
- Decrease VOC emissions from painting activities; and
- Increase VOC emissions from thinning operations (net increase of 1.84 tpy VOC).

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	0.31	0.31	0.0
SO ₂	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
CO	0.00	0.00	0.00
VOC *	17.15	18.99	+ 1.84

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Benzene	0.001	0.001	0.0
Ethyl Benzene	0.142	0.208	+0.066
Glycol Ethers	0.969	1.038	+0.069
Methanol	0.772	1.369	+0.597
Methyl Ethyl Ketone	1.22	0.646	-0.574
Methyl Isobutyl Ketone	0.06	0.073	+0.013
Naphthalene	0.169	0.267	+0.098
Toluene	4.725	6.853	+2.128
Xylene	0.497	0.566	+0.069
Total	8.555	11.021	+2.466

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*HRVOC Speciation:

Toluene

Xylene

*Other VOC (TPY): 7.969

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Chromium and compounds	-	<0.001	+<0.001
Manganese and compounds	0.0	0.010	+0.010
Nickel and compounds	-	<0.001	+<0.001
Total	0.0	0.010	+0.010

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations. National Emission Standards for Hazardous Air Pollutants (NESHAP), Prevention of Significant Deterioration (PSD)/Nonattainment New Source Review (NNSR), and New Source Performance Standards (NSPS) do not apply.

Stupp Corp is located adjacent to Bayou Coating, LCC (AI 27559) and the two facilities are under common control. Bayou Coating was issued a Title V operating permit on July 27, 2007, therefore, Stupp Mill is part of a facility that is classified as a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable

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requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 2008; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

VIII. General Condition XVII Activities

None

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IX. Insignificant Activities

Description	Max. Operating Rate or Capacity	Operating Schedule	Citation
			Insignificant Activity per
Cooling Tower	103 gpm	8760 hr/yr	LAC 33:III.501.B.5.D
Parts Washers	250 gallons each	8760 hr/yr	LAC 33:III.501.B.5.A.2
Portable Fuel Tank	4,000 gallons	8760 hr/yr	LAC 33:III.501.B.5.A.3
Stripper Tank (3,750 gal/yr)	375 gallons	8760 hr/yr	LAC 33:III.501.B.5.A.10
96-1, Diesel Storage Tank	8,000 gallons	8760 hr/yr	LAC 33:III.501.B.5.A.3
96-3, Emergency Diesel Generator	250 hp	48 hrs/yr	LAC 33:III.501.B.5.B.45
96-6, Pipe Cooling Vent	2120 cfm	8760 hr/yr	LAC 33:III.501.B.5.D
Natural Gas-Fired Heaters	<1 MM Btu/hr	8760 hr/yr	LAC 33:III.501.B.5.A.5

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter																		
		2	5 ^A	9	11	13	15	2103	2104*	2107	2111	2113	2121	2123	22	29*	51*	53*	56	59*
UNF1 FAC	Stupp Corporation	1	1	1	1	1	3				3	1			3	1	1		1	3
ARE 1	96-4 Painting and Hand Stenciling Operation																			
ARE 3	02-3 Thinner Cleanup Operation																			
EQT 4	96-5 Welding Operation																			
EQT 15	96-2 Gasoline Storage Tank							1												
EOT 16	08-1 Welding Operations (Spiral Mill)																			

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements																	
ID No.:	Description	40 CFR 60 NSPS						40 CFR 61		40 CFR 63 NESHAP		40 CFR					
		A	K	Ka	Kb	Dc	Gg	Kkk	llll	Aj	V	A	MMMM	52	64	68	82
UNF1	Stupp Corporation												3		3	3	3
ARE 1	96-4 Painting and Hand Stenciling Operation																
ARE 3	02-3 Thinner Cleanup Operation																
EQT 4	96-5 Welding Operation																
EQT 15	96-2 Gasoline Storage Tank		3	3	3												
EQT 16	08-1 Welding Operations (Spiral Mill)																

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
UNF01 Stupp Corp	40 CFR 64-Compliance Assurance Monitoring [40 CFR 64.1 -64.10]	DOES NOT APPLY. The PSEUs do not meet the applicability requirements. None of the emission sources are equipped with control devices to achieve compliance and none of emission sources have potential pre-control device emissions equal to or greater than 100 percent of the major source threshold limit.
	National Emission Standards for Organic Hazardous Air Pollutants For Surface Coating of Miscellaneous Metal Parts and Products [40 CFR 63 Subpart M MMMM]	DOES NOT APPLY. Facility does not apply coatings as defined in the MACT. 40 CFR 63.3981
	40 CFR 68 -Chemical Accident Prevention	DOES NOT APPLY. Facility does not produce, process, handle, or store any listed substances in quantities greater than the threshold quantities.
	40 CFR 82 -Stratospheric Ozone Protection	Motor Vehicle Air Conditioners are not maintained, serviced, repaired, or disposed of at this facility, therefore the facility is not subject to standards for recycling and emissions reduction.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1511.A]	DOES NOT APPLY. There are no single point sources that emit or have the potential to emit > 5 tons per year of SO ₂ .

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UNF01 Stupp Corp Continued	Pumps and Compressors [LAC 33:III.2111]	DOES NOT APPLY. There are no pumps or compressors handling volatile organic compounds having a true vapor pressure of ≥ 1.5 psia at handling conditions at the facility.
	Control of Emissions of Nitrogen Oxides [LAC 33:III.Chapter 22]]	DOES NOT APPLY. There are no regulated emission sources of NOx at the facility.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]]	DOES NOT APPLY. Facility does not produce, process, handle, or store any listed substances in quantities greater than the threshold quantities.
EQT 15 96-2	NSPS Subpart K - Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. Storage tank capacity is < 1000 gallons.
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. Storage tank capacity is < 1000 gallons
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tank capacity is < 1000 gallons

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

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- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;

40 CFR PART 70 GENERAL CONDITIONS

4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
5. changes in emissions would not qualify as a significant modification; and
6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]

R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).

1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

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- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]
- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.

- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.

- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated <...>, 200_, along with supplemental information dated <...>, 200_.

- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of the permit may be appealed to the secretary in writing pursuant to La. R.S. 30:2024(A) within 30 days from notice of the permit action. A request may be made to the secretary to suspend those provisions of the permit specifically appealed. The permit remains in effect to the extent that the secretary or assistant secretary does not elect to suspend the appealed provisions as requested or, at his discretion, other permit provisions as well. Construction cannot proceed, except as specifically approved by the secretary or

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

assistant secretary, until a final decision has been rendered on the appeal. A request for hearing must be sent to the Office of the Secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1157 Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

Also Known As:	ID	Name	User Group	Start Date
	0840-00147	Stupp Corp	CDS Number	08-05-2002
	43-0542490	Federal Tax ID	Federal Tax ID	11-21-1999
	LAD006299838	Stupp Corp	Hazardous Waste Notification	01-06-1995
	LAR05M621	LPDES #	LPDES Permit #	05-22-2003
	WP2123	LWDPS #	LWDPS Permit #	06-25-2003
	G-033-2556	Site ID #	Solid Waste Facility No.	11-21-1999
	43431	Stupp Brothers Inc	TEMPO Merge	01-22-2001
	71211	Stupp Corp - Thomas Road Plant	TEMPO Merge	01-07-2002
	70821STPPCPOBOX	TRI #	Toxic Release Inventory	07-08-2004
	17009115	UST Facility ID (from UST legacy data)	UST FID #	10-11-2002
	LAG550002	Stupp Corp	Water Permitting	05-27-1993

Main Phone: 2257786531

Physical Location: 12555 Ronaldson Rd
 Baton Rouge, LA 70807

Mailing Address: 12555 Ronaldson Rd
 Baton Rouge, LA 70807

Location of Front Gate: 30° 33' 34" latitude, 91° 10' 34" longitude, Coordinate Method: Lat/Long, - DMS, Coordinate Datum: NAD83

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Barbara Guynes	12555 Ronaldson Rd Baton Rouge, LA 70807	2257786633 (WF)	Emission Inventory Contact for
	Barbara Guynes	12555 Ronaldson Rd Baton Rouge, LA 70807	2257786531 (WP)	Emission Inventory Contact for
	Barbara Guynes	12555 Ronaldson Rd Baton Rouge, LA 70807	bguynes@stupp.com	Emission Inventory Contact for
	Paul Higdon	12555 Ronaldson Rd Baton Rouge, LA 70807	2257786531 (WP)	Haz. Waste Billing Party for
	Paul Higdon	12555 Ronaldson Rd Baton Rouge, LA 70807	2257786531 (WP)	Water Permit Contact For
	Paul Higdon	12555 Ronaldson Rd Baton Rouge, LA 70807	2257786531 (WP)	Air Permit Contact For
	Edward Scram	12555 Ronaldson Rd Baton Rouge, LA 70708	2257782000 (WP)	Operates
	Edward Scram	12555 Ronaldson Rd Baton Rouge, LA 70708	2257782000 (WP)	Responsible Official for
	Edward Scram	12555 Ronaldson Rd Baton Rouge, LA 70708	2257782000 (WP)	Owms
	General Manager of Operations			Air Designated Representative for

Related Organizations:	Name	Address	Phone (Type)	Relationship
	Stupp Corp	12555 Ronaldson Rd Baton Rouge, LA 70807		Owms
	Stupp Corp	12555 Ronaldson Rd Baton Rouge, LA 70807		Emission Inventory Billing Party
	Stupp Corp	12555 Ronaldson Rd Baton Rouge, LA 70807		Air Billing Party for
	Stupp Corp	12555 Ronaldson Rd Baton Rouge, LA 70807		Water Billing Party for

General Information

AI ID: 1157 Stupp Corp
Activity Number: PER20080002
Permit Number: 0840-00147-V0
Air - Title V Regular Permit Initial

NAIC Codes: 331210, Iron and Steel Pipe and Tube Manufacturing from Purchased Steel

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-0775 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1157 - Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Stupp Corporation Baton Rouge						
ARE 0001	96-4 - Painting and Hand Stenciling Operations		3675 gallons/yr			4992 hr/yr
ARE 0003	02-3 - Thinner Cleanup Operation		2844 gallons/yr			4992 hr/yr
EQT 0004	96-5 - Welding Operations		26000 lb/yr			4160 hr/yr
EQT 0015	96-2 - Gasoline Storage Tank	1000 gallons	7500 gallons/yr	7500 gallons/yr		8760 hr/yr
EQT 0016	08-1 - Welding Operations (Spiral Mill Facility)		5.5 MM lbs/yr		Welding wire	7488 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Stupp Corporation Baton Rouge							
EQT 0015	96-2 - Gasoline Storage Tank	9	10.7	.16			77

Relationships:**Subject Item Groups:**

ID	Group Type	Group Description
UNF 0001	Unit or Facility Wide	Stupp - Stupp Corporation Baton Rouge

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1060	1060 Fabricated Plate Work with 5 or More Welders		

SIC Codes:

3317	Steel pipe and tubes	AI 1157
3317	Steel pipe and tubes	UNF 001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1157 - Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

Subject Item	PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Stupp Corporation Baton Rouge						
ARE 0001 96-4				3.294	6.587	8.221
ARE 0003 02-3				3.92	7.84	9.79
EQT 0004 96-5	0.06	0.08	0.16			
EQT 0015 96-2				0.22	0.33	0.98
EQT 0016 08-1	0.04	0.08	0.15			

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1157 - Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
ARE 0001 96-4	Benzene	<0.001	0.001	0.001
	Ethyl benzene	0.083	0.167	0.208
	Glycol ethers (Table 51.3)	0.416	0.832	1.038
	Methanol	0.005	0.009	0.012
	Methyl ethyl ketone	0.231	0.462	0.576
	Methyl isobutyl ketone	0.001	0.002	0.003
	Naphthalene	0.107	0.214	0.267
	Toluene	0.221	0.442	0.552
	Xylene (mixed isomers)	0.227	0.454	0.566
ARE 0003 02-3	Methanol	0.54	1.09	1.360
	Methyl ethyl ketone	0.03	0.06	0.07
	Methyl isobutyl ketone	0.03	0.06	0.07
	Toluene	2.52	5.05	6.30
EQT 0004 96-5	Chromium VI (and compounds)	<0.001	0.001	<0.001
	Manganese (and compounds)	0.003	0.005	0.009
	Nickel (and compounds)	<0.001	0.001	<0.001
EQT 0016 08-1	Chromium VI (and compounds)	<0.001	0.001	<0.001
	Manganese (and compounds)	<0.001	0.001	<0.001
	Nickel (and compounds)	<0.001	0.001	<0.001
UNF 0001 Stupp	Benzene			0.001
	Chromium VI (and compounds)			<0.001
	Ethyl benzene			0.208
	Glycol ethers (Table 51.3)			1.038
	Manganese (and compounds)			0.010
	Methanol			1.369
	Methyl ethyl ketone			0.646
	Methyl isobutyl ketone			0.073
	Naphthalene			0.267
	Nickel (and compounds)			<0.001
	Toluene			6.853
	Xylene (mixed isomers)			0.566

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1157 - Stupp Corp
Activity Number: PER20080002
Permit Number: 0840-00147-V0
Air - Title V Regular Permit Initial

SPECIFIC REQUIREMENTS

AI ID: 1157 - Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

ARE 0001 96-4 - Painting and Hand Stenciling Operations

- 1 [LAC 33-III.501.C.6] Paint Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total gallons of paint used each month, as well as the total gallons of paint used for the last twelve consecutive months. Calculate and record VOC emissions using paint throughput, and MSDS sheets. Make records available for review by the Office of Environmental Compliance, Surveillance Division.
- 2 [LAC 33-III.501.C.6] Paint Throughput \leq 3675 gallons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if paint throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 Paint Throughput monitored by inventory records and calculations monthly.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
- 3 [LAC 33-III.501.C.6]

ARE 0003 02-3 - Thinner Cleanup Operation

- 4 [LAC 33-III.501.C.6] Thinner Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total gallons of thinner used each month, as well as the total gallons of thinner used for the last twelve consecutive months. Calculate and record VOC emissions using paint throughput, and MSDS sheets. Make records available for review by the Office of Environmental Compliance, Surveillance Division.
- 5 [LAC 33-III.501.C.6] Thinner Throughput \leq 2900 gallons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if thinner throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
 Thinner Throughput monitored by inventory records and calculations monthly.
 Which Months: All Year Statistical Basis: Twelve-consecutive-month maximum
- 6 [LAC 33-III.501.C.6]

EQT 0004 96-5 - Welding Operations

- 7 [LAC 33-III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33-III.1305.1-7.

EQT 0015 96-2 - Gasoline Storage Tank

- 8 [LAC 33-III.2103.A] Equip with a submerged fill pipe.
- 9 [LAC 33-III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33-III.2103.I.1 - 7, as applicable.

EQT 0016 08-1 - Welding Operations (Spiral Mill Facility)

- 10 [LAC 33-III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33-III.1305.1-7.

SPECIFIC REQUIREMENTS

AI ID: 1157 - Stupp Corp
 Activity Number: PER20080002
 Permit Number: 0840-00147-V0
 Air - Title V Regular Permit Initial

UNF 0001 Stupp - Stupp Corporation Baton Rouge

- 11 [40 CFR 70.5.a.1.(iii)] Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
 - 12 [40 CFR 70.6.a.3.(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
 - 13 [40 CFR 70.6.a.3.(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(ii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
 - 14 [40 CFR 70.6.c.5.(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
 - 15 [LAC 33-III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33-III.111 or intensify an existing traffic hazard condition are prohibited.
 - 16 [LAC 33-III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
 - 17 [LAC 33-III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
 - 18 [LAC 33-III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33-III.2113.A.1-5.
 - 19 [LAC 33-III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
 - 20 [LAC 33-III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33-III.2901.G are prohibited.
 - 21 [LAC 33-III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33-III.2901.G.
 - 22 [LAC 33-III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33-III Chapter 5.
 - 23 [LAC 33-III.501.C.4] Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the procedures in LAC 33-III Chapter 5.
- Operate the source in accordance with all terms and conditions of this permit.

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- 24 [LAC 33:III.501.C.6] Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
- 25 [LAC 33:III.501.C.6] Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expeditiously repair leaks that occur. Update the written plan presently required by LAC 33:III.213.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).
- 26 [LAC 33:III.501.C.6] Comply with terms and conditions incorporated in the permit to ensure compliance with all state and federally applicable air quality requirements and standards at the source, and such other permit terms and conditions as determined by the permitting authority to be reasonable and necessary.
- 27 [LAC 33:III.507.A.1.a] Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.
- 28 [LAC 33:III.507.E.4] Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.
- 29 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 30 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 31 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 32 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 33 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 34 [LAC 33:III.5107.A] Submit Annual Emissions Report (TEDI): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 35 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

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36 [LAC 33:III.5107.B.2]

Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.

37 [LAC 33:III.5107.B.3]

Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931. Submit notification in the manner provided in LAC 33:III.3923.

38 [LAC 33:III.5107.B.4]

Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.

39 [LAC 33:III.5107.B.5]

Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.

40 [LAC 33:III.5109.C]

Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.

41 [LAC 33:III.5113.A.1]

Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.

42 [LAC 33:III.5113.A.2]

Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.

43 [LAC 33:III.517.A.1]

Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III. Chapter 5 prior to approval by the permitting authority.

44 [LAC 33:III.517.B.1]

Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.

45 [LAC 33:III.517.D]

Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III. Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18.

46 [LAC 33:III.517.E]

In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.

47 [LAC 33:III.517.G]

Submit change of ownership notification in accordance with LAC 33:III. Chapter 19.

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48 [LAC 33:III.5611.A]

Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.

49 [LAC 33:III.5611.B]

During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.

50 [LAC 33:III.919.D]

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.